

TITLE 326 AIR POLLUTION CONTROL BOARD

#99-218(APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from August 1, 2000, through August 31, 2000, on IDEM's draft rule language. IDEM received comments from the following parties:

Delphi Delco Electronic Systems (Delphi)
Richmond State Hospital (Richmond)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: The draft rule in the August 1, 2000, Indiana Register did not include a change previously submitted for NEDS ID 03, Point ID 20P; only one of the two boilers listed is still operational. In addition, the rule changes intended for Delphi Delco document only twelve (12) combustion sources that were in operation at the time of the original attainment determination for Howard County. Since that time, Delphi Delco has installed eleven (11) additional units (under 326 IAC 2 construction permits) that are not reflected in 326 IAC 6-1-15. What is the purpose of continuing to update the rules if they do not reflect the current countywide inventory? IDEM no longer considers Howard County to be "nonattainment." Delphi Delco believes action should be taken to upgrade the Howard County status and thereby delete 326 IAC 6-1-15. (Delphi)

Response: The rule will be amended to reflect the change for the boilers listed at NEDS ID 03, Point ID 20P. Howard County is currently designated as a "maintenance" county for particulate matter. The inventory in 326 IAC 6-1-15 reflects operations in existence at the time of the "nonattainment" designation of Howard County. Units added since then do not have specific limitations, but are regulated under general requirements in 326 IAC 6-1-1 and 326 IAC 6-1-2 so that the county does not fall back into nonattainment.

Comment: Richmond State Hospital no longer has any coal burning operations. They were converted to gas/oil about six (6) years ago. Oil is burned only to test the equipment and for gas curtailments. The inventory for the institution consists of two (2) converted boilers that have a maximum input of 45 MMBTU, one (1) fire tube boiler with a maximum input of 20.9 MMBTU, and one (1) fire tube boiler with a maximum input of 12.5 MMBTU. The total maximum input is 122.4 MMBTU. (Richmond)

Response: The current permits in IDEM's Office of Air Management show the change from coal to gas/oil for boiler #3 and #4, but not for boiler #1 and #2. Richmond State Hospital's four boilers' particulate limitations are combined in 326 IAC 6-1-14. Before the changes in any of the boiler operations can be reflected in 326 IAC 6-1, an amendment to the hospital's permit for boiler numbers 1 and 2 must be made through the Permits Branch of the Office of Air Management.